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April 29, 2025

**VIA ECF**

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: Elizabeth Valdez v. Go Broome LLC, et al.  
Civil Action No. 25-CV-960 (KPF) (KHP)

Dear Judge Failla:

My firm represents defendant GO Broome, LLC in the above-referenced matter. I am writing pursuant to Your Honor's individual rules to request an extension of time to respond to the complaint up to and including May 23, 2025.<sup>1</sup> This is GO Broome's first request for an extension and Plaintiff's counsel consents to this request. The reason for the request is that I was only informed yesterday that my firm will also be representing GO Broome. Thank you for your consideration.

Respectfully submitted,

RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to read 'Bruno', written over a horizontal line.

Jonathan B. Bruno

cc: Counsel of Record via ECF

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<sup>1</sup> This is the same deadline for the City Defendants and my other client, Gotham Real Estate Managers, LLC, to respond to the complaint

Application GRANTED. Defendant GO Broome, LLC shall answer, move, or otherwise respond to the Complaint on or before **May 23, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 22.

Dated: April 30, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE